



StepUp Sports Coaching
Keeping the Future Fit

Data Protection Policy

At StepUp Sports Coaching we respect the privacy of the children attending our sessions, and the privacy of their parents/carers, as well as the privacy of our staff. Our aim is to ensure that all those using and working at StepUp Sports Coaching can do so with confidence that their personal data is being kept secure.

Our lead person for data protection is Wayne Boardman. The lead person ensures that we meet requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

Confidentiality

StepUp Sports Coaching respects confidentiality in the following ways:

- We will only ever share information with a parent about their own child.
- Information given by parents to StepUp Sports Coaching staff about their child will not be passed on to third parties without permission unless there is a safeguarding concern (as covered in our Safeguarding Policy).
- Concerns or evidence relating to a child's safety will be kept in a confidential file and will not be shared within the Club, except with the Designated Safeguarding Lead and the Club Manager.
- Staff only discuss individual children for purposes of planning and group management.
- Staff are made aware of the importance of confidentiality during their induction process.
- Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- All personal data is stored securely on a password protected computer.
- Students on work placements and volunteers are informed of our Data Protection Policy and are required to respect it.

Information That we Keep

Children and Parents

We hold only the information necessary to provide a childcare service for each child. This includes child registration information, medical information, parent contact information, attendance records, incident and accident records and so forth. Our lawful basis for processing this data is fulfilment of our contract with the child's parent/carer. Our legal condition for processing any health-related information about a child is so that we can provide appropriate care to the child. Once a child leaves, we only retain



only the data required by statutory legislation, insurance requirements and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted, and paper records are disposed of securely.

Staff

We keep information about employees to meet HMRC requirements, and to comply with all other areas of employment legislation. Our lawful basis for processing this data is to meet our legal obligations. Our legal condition for processing data relating to an employee's health is to meet the obligations of employment law. We retain the data after a staff member has left our employment for the period required by statutory legislation and best practice, then it is deleted or destroyed, as necessary.

Sharing Information with Third Parties

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (e.g. The Police, HMRC etc). If we decide to share information without parental consent, we will record this in the child's file clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and wellbeing of the children in our care.

Where we share relevant information where there are safeguarding concerns, we will do so in line with Government guidance from 'Information Sharing Advice for Safeguarding Practitioners.'

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the running of the business, for example to take online bookings, and to manage payroll and accounts. Any such third parties comply with strict data protection regulations of the GDPR. Current third parties we engage with to run our business are:

- KidsClubHQ – online booking system
- Stripe – online payment processing system
- QuickBooks and FreeAgent – payroll and accounting
- Mailchimp – marketing distribution lists

Subject Access Requests

- Parents/Carers can ask to see the information and records relating to their child, and/or any other information we kept about themselves



- Staff and volunteers can ask to see any information that we keep about them
- We will make the requested information available as soon as practicable, and will respond to the request within one month at the latest
- If our information is found to be incorrect or out of date, we will update it promptly
- Parents/carers can ask us to delete data, but this may mean that we can no longer provide care to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our care, we must keep some data for specific periods, so we will not be able to delete all data immediately
- Staff and volunteers can ask us to delete their data, but this may mean that we can no longer employ them as we have legal obligation to keep certain data. In addition, even after a staff member has left our employment, we must keep some data for specific periods, so we will not be able to delete all data immediately
- If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

GDPR

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.